

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*,¹

Debtors.

This Document Relates to:

Claimant, Pavel Vorobets
Claim Number: 85324

Chapter 11

Case No. 22-11068 (JTD)

(Jointly Administered)

Re: Doc. 27192

Hearing Date: December 12, 2024 at 1:00 P.M. ET

Objection Deadline: December 6, 2024 at 4:00 P.M. ET

CLAIMANT 85324's RESPONSE
IN OPPOSITION TO THE DEBTORS' 129th OMNIBUS OBJECTION

Comes now, Pavel Vorobets, Claimant 85324 (hereinafter “Claimant” or “Claimant 85324”), and herein submits his response to the Debtors’ 129th Omnibus Objection. In the 129th Omnibus Objection, the Debtors objected to the Claimant’s Proof of Claim, stating that after “Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtors have not identified any liability owing to, or customer entitlement of, the Claimant.” *See* Schedule 1 of Debtors’ 129th Omnibus Objection (Doc. No. 27192-2) at p. 16.

However, contrary to the Debtors’ objection that no records exist establishing an entitlement, the FTX Customer Claims Portal shows that Claimant 85324 has an entitlement of at least \$7,397.10 (USD). Exhibit A – Declaration of Daniel J. Thornburgh. Furthermore, the screenshot provided below which was pulled from the FTX Customer Claims Portal shows that Claimant 85324 held the following positions at the time of the bankruptcy:

Total Customer Entitlement Claim			\$7,397.10 USD
Balances	Deposits	Withdrawals	Positions
Positions			
Market	Side	Position Size	USD Value
BTC-PERP	Long	0.3 BTC	\$5,132.40
CHZ-PERP	Long	26,150 CHZ	\$4,896.59
CRO-PERP	Long	62,040 CRO	\$5,127.61
ETH-PERP	Long	4.5 ETH	\$5,504.63
Rows per page: 100			1-4 / 4

By applying the cryptocurrency values from the Conversion Table to the positions held by Claimant at the time of the bankruptcy, the Claimant is owed an entitlement of \$20,661.23 (USD), as set forth below:

- BTC-PERP: $0.3 \times \$17,108.00 = \$5,132.40$
- CHZ-PERP: $26,150 \times \$0.1872500 = \$4,896.59$
- CRO-PERP: $62,040 \times \$0.0826500 = \$5,127.61$
- ETH-PERP: $4.5 \times \$1,223.25 = \$5,504.63$

Total Entitlement Owed: \$20,661.23

As such, the Claimant respectfully disagrees with the Debtors' objection as the Debtors' own Customer Claims Portal shows that Claimant 85324 is, at a minimum, entitled to \$7,397.10 (USD). However, based on the positions held at the time of the bankruptcy, it is Claimant's position that he is owed \$20,661.23 (USD).

Wherefore, Claimant 85324 respectfully moves for an order modifying his entitlement to \$20,661.23 (USD). In the alternative, Claimant requests modification to the \$7,297.10, as reflected in the FTX Customer Claims Portal.

Dated: 12/6/24

Respectfully submitted ,

By:

/s/ Deirdre M. Richards
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-and-

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